

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

NIKI ROBINSON AND
PATRICK TOMLINSON,

Plaintiffs,

Case No. 2:24-cv-264

v.

CITY OF MILWAUKEE, *et al.*,

Defendants.

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiffs Niki Robinson and Patrick Tomlinson move for partial summary judgment under FED. R. CIV. P. 56 and the Court's Pretrial Procedures Order, ECF 9 at 6–10. The parties will submit a single statement of facts with their motions and proposed jury instructions. Specifically, Plaintiffs move for summary judgment, as to liability only, on Counts:

A: against Defendants Nicole Plevak, Andrew Switzer, and Andrew Dudley;

C: against Defendants Lyndon Evans, Christian Garrido, and Bradley Orlando;

E: against Defendants Evans and Nathaniel Petersen; and

F: against Defendant Evans.

See ECF 42 (second amended complaint, which is the operative pleading), at 25–35. The undisputed facts show that these Defendants in these claims, while acting under color of law, violated Plaintiffs' Fourth Amendment rights and are therefore liable under 42 U.S.C. § 1983. Plaintiffs will file a brief in support of their motion.

Dated: 5 June 2025,

STRANG BRADLEY, LLC

/s/R. Rick Resch

John H. Bradley

Wisconsin Bar No. 1053124

R. Rick Resch

Wisconsin Bar No. 1117722

William E. Grau

Wisconsin Bar No. 1117724

James Odell

Wisconsin Bar No. 1131587

STRANG BRADLEY, LLC

613 Williamson St., Suite 204

Madison, WI 53703

(608) 535-1550

John@StrangBradley.com

Rick@StrangBradley.com

William@StrangBradley.com

James@StrangBradley.com

Attorneys for Plaintiffs